## EXHIBIT 3



Susan L. Nardone Director

Gibbons P.C. One Gateway Center Newark, NJ 07102-5310 Direct: 973-596-4487 Fax: 973-639-6217 snardone@gibbonslaw.com

November 10, 2023

## **VIA ELECTRONIC AND REGULAR MAIL**

Steven I. Adler, Esq. Mandelbaum Barrett PC 3 Becker Farm Road, Suite 105 Roseland, New Jersey 07068

**Re:** Matthew Ornelas-Kuh

Dear Steve:

As you are aware, this Firm represents Matthew Ornelas-Kuh concerning his former employment with CC Ford Group West, LLC (CC Ford or the Company). We write in response to your October 17, 2023 correspondence.

By way of background, you first sent Mr. Ornelas-Kuh a letter on April 28, 2023. We advised you of our representation on May 1. Shortly thereafter, on May 11, we received a litigation hold letter from your office. After several attempts to connect, we finally spoke by phone on May 16, 2023. During that call, we discussed the following, among other things:

- You shared CC Ford's concerns regarding alleged expense improprieties by Mr.
  Ornelas-Kuh. You indicated that you were still collecting information and I invited
  you to come back to me with an accounting, which I agreed to review with Mr.
  Ornelas-Kuh.
- I requested a copy of the recording that your client made of the April 26 meeting with Mr. Ornelas-Kuh. As you will recall, on March 31, 2023, Mr. Ornelas-Kuh notified CC Ford of his plans to resign effective May 9, 2023. Mr. Ornelas-Kuh was called into a meeting on April 26, 2023 and notified that his employment would end that day. You acknowledged that your client had recorded the meeting and said that you would discuss it with your client and come back to me.
- I informed you that at my direction, Mr. Ornelas-Kuh was in the process of collecting any CC Ford property in his possession and was prepared to return it to the company.
- I informed you that Mr. Ornelas-Kuh is owed commissions earned prior to his separation. He provided his calculations to Mr. Studdiford before his separation but was never paid.

GIBBONS P.C.

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## V. Subpoena

Please be advised that I am not authorized to accept service of the Subpoena Duces Tecum forwarded by Ms. Matton via email on November 8, 2023 on Mr. Ornelas-Kuh's behalf.

Should you wish to discuss this matter, please do not hesitate to contact me.

Very truly yours,

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Susan L. Nardone Director

Cc: Janine Matton, Esq.